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M E M O R A N D U M

December 16, 1981

RECEIVED  
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TO: Tom Cook, RoweSix  
FROM: Will Abercrombie, <sup>we</sup> Southwest Regional Office  
SUBJECT: RCRA Inspection conducted at Hardel Mutual Plywood in  
Olympia, WA, on December 9, 1981

PROGRAM DEVELOPMENT SECTION

During the recent RCRA inspection conducted at Hardel Mutual Plywood, it became obvious that this facility was in error by initially notifying EPA as a RCRA TSD facility. To my knowledge, Hardel Mutual does not generate, transport, treat, store, dispose, or handle any RCRA wastes in quantities large enough to meet federal notification requirements. It appears that the TSD notification was a result of mass confusion on the part of this firm's office manager. Mr. Vic Durham (general manager) and Gaylen Bryan (assistant manager) of Hardel Mutual Plywood were unaware of RCRA and have made no attempt to comply with interim status standards. I have recommended that Mr. Durham contact Linda Dawson and request RCRA delisting from EPA. Accordingly, I see no reason to complete the RCRA inspection form. This memorandum will serve as documentation that a RCRA inspection was conducted at Hardel Mutual and a copy will be sent to Linda Dawson for her information.

Even though Hardel Mutual does not appear to meet RCRA criteria, I noted some practices that may be of concern from a state water pollution/hazardous waste standpoint. The following is a list of the potential concerns now under investigation by the SWRO:

1. Ninety-five percent (95%) of the dilute phenolic glue wash water (from equipment washing) is used for makeup. On occasion, more wash water is produced than can be recycled, necessitating disposal. At present, Jones Septic Service is contracted to dispose of this waste at the Thurston County Landfill. This office has some toxicity information on phenolic glue wash water and it does not appear to meet state hazardous waste criteria. However, we are less than excited about having this liquid dumped into the landfill and will be taking a closer look at alternatives.
2. Knot holes in the plywood are patched using a Glidden product called Panel Patch II, a polyurethane resin produced by mixing a polyoil with polymethylene Polyphenyl-isocyanate. The application equipment is cleaned with a Laurence-David, Inc., product called Safety Flush, a mixture of water, isopropyl alcohol and a surfactant. Less than 1 gallon/day of this material is disposed of at the local landfill. This waste needs to be tested against state hazardous waste criteria.



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3. Empty "isocyanate" drums are sold for burning barrels without proper rinsing. This practice needs to be investigated.

I will send a letter to Hardel Mutual listing our concerns and requesting cooperation. In general, this facility has a clean operation. The recent "popularity" of Budd Inlet has greatly concerned Hardel Mutual management and they expressed a desire to cooperate and keep a low profile.

Please contact me if you have any questions at (206) 753-6949.

WA:si

cc: Linda Dawson, EPA Region X, Seattle